



Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745



Permit No.: TV-14-1006-C

Plant ID 187

Effective Date: [Click here to enter a date.](#)

Expiration Date: [Click here to enter a date.](#)

Eckart America Corporation
4101 Camp Ground Road
Louisville, KY 40211

is authorized to construct the described process equipment by the Louisville Metro Air Pollution Control District. Authorization is based on information provided with the application submitted by the company and in accordance with applicable regulations and the conditions specified herein.

Process equipment description:

Boilers #5 & #4, natural gas fired only
(Make: Cleaver Brooks; Model CB-200-300; Capacity: 12.533 MMBTU/hr; Installation: 1988)

Applicable Regulation(s): 2.03, 5.00, 5.01, 5.20, 5.21, 5.22, 5.23, 7.06

Application No.: 65327

Application Received: 10/27/1989

Permit Writer: Chris Gerstle

Public Comment Date: 6/5/2014

{manager1}
Air Pollution Control Officer
{date1}

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Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
Initial	??/??/2014	06/05/2014	Initial	Entire Permit	Correcting the emission standards from Permits 381-90-C and 382-90-C

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made after receipt of the statement of fees (SOF). The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator of the affected facility covered by this permit shall notify the District of any process change, equipment change, material change, or change in method or hours of operation. This requirement is applicable to those changes that may have the potential for increasing the emission of air contaminants to a level in excess of the applicable limits or standards specified in this permit or District regulations.
- G2. The owner or operator shall obtain new or revised permits from the District when:
(See District Regulation 2.16 for Title V sources. See District Regulation 2.17 for FEDOOP sources. See District Regulation 2.03 for other sources.)
 - a. The company relocates to a different physical address.
 - b. The ownership of the company is changed.
 - c. The name of the company as shown on the permit is changed.
 - d. Permits are nearing expiration or have expired.
- G3. The owner or operator shall submit a timely application for changes according to G2. For minor sources only, the District does not require application for permit renewal. The District automatically commences the process of permit renewal for minor sources upon expiration. Timely renewal is not always achievable; therefore, the company is hereby authorized to continue operation in compliance with the latest District permit(s) until the District issues the renewed permit(s).
- G4. The owner or operator shall not be authorized to transfer ownership or responsibility of the permit. The District may transfer permits after appropriate notification (Form 100A) has been received and review has been made.
- G5. The owner or operator shall pay the required permit fees within 30 days after issuance of the SOF by the District, unless other arrangements have been proposed and accepted by the District.
- G6. This permit allows operation 8,760 hours per year unless specifically limited elsewhere in this permit.
- G7. The owner or operator shall submit emission inventory reports as required by Regulation 1.06.
- G8. The owner or operator shall timely report abnormal conditions or operational changes, which may cause excess emissions as required by Regulation 1.07.
- G9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G10. If a change in the "Responsible Official" (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form 100A) to the District within 30 calendar days of the date the RO change occurs.

Emission Unit U-1: Boiler Room

Boilers are used to generate heat and steam for the plant.

U-1 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3.1, 4.1.4, 4.2, 5.1.1, 8

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions (STAR)	1, 2
5.01	General Provisions (STAR)	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant (STAR)	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants (STAR)	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant (STAR)	1 through 5
5.23	Categories of Toxic Air Contaminants (STAR)	1 through 6

U-1 Equipment

Emission Point	Description	Applicable Regulation	Control ID	Stack ID
E-1	Boiler #5, natural gas fired only (Make: Cleaver Brooks; Model CB-200-300; Capacity: 12.533 MMBTU/hr; Installation: 1988)	STAR 7.06	N/A	S-1
E-2	Boiler #4, natural gas fired only (Make: Cleaver Brooks; Model CB-200-300; Capacity: 12.533 MMBTU/hr; Installation: 1988)			S-2

U-1 Control Devices

There are no control devices associated with this unit.

U-1 Specific Conditions**S1. Standards** (Regulation 2.03, section 6.1)**a. PM**

The owner or operator shall not cause to be discharged into the atmosphere from Emission Points E-1 and E-2 particulate matter in excess of 0.342 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.4)

b. Opacity

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. (Regulation 7.06, section 4.2)

c. SO₂

The owner or operator shall not cause to be discharged into the atmosphere from Emission Points E-1 and E-2 any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of gaseous fuels. (Regulation 7.06, section 5.1.1)

d. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

S2. Monitoring and Record Keeping (Regulation 2.03, section 6.1)**a. Opacity**

There are no monitoring or record keeping requirements for Opacity compliance. (U-1 Comment 1)

b. PM

There are no monitoring or record keeping requirements for PM compliance. (U-1 Comment 2)

c. SO₂

There are no monitoring or record keeping requirements for SO₂ compliance. (U-1 Comment 2)

d. TAC

There are no monitoring or record keeping requirements for TAC compliance. (U-1 Comment 3)

S3. Reporting (Regulation 2.03, section 6.1)

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports.

a. Opacity

There are no routine compliance reporting requirements for this equipment. (U-1 Comment 1)

b. PM

There are no routine compliance reporting requirements for this equipment.
(U-1 Comment 2)

c. SO₂

There are no routine compliance reporting requirements for this equipment.
(U-1 Comment 2)

d. TAC

There are no routine compliance reporting requirements for this equipment.
(U-1 Comment 3)

U-1 Comments

1. The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
2. Using AP-42 emission factors and combusting natural gas, the boilers cannot exceed the pounds per million BTU emission standards. Therefore, there are no monitoring, record keeping, and reporting requirements for this boiler with respect to PM and SO₂ emission limits.
3. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas.
(Regulation 5.01, section 1.6.7)
4. The boiler commenced construction prior to June 9, 1989 and therefore is not subject to 40 CFR part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
5. The Source submitted a Subpart JJJJJ Notification on September 14, 2011 indicating that fuel oil is no longer used at the facility. Per §63.11195(e), a gas-fired boiler is not subject to the subpart.
6. This construction permit replaces the standards contained in construction permits 381-90-C and 382-90-C, effective date 10/27/1989.

Emission Factors and Calculation Methodologies

Emissions are calculated by multiplying the throughput (MMCF) of the equipment by the appropriate emission factor.

Table 1 Unit U-1: Boiler Room

Equipment	Emission Point	Emission Factor Source
Boiler #5	E-1	AP-42 Chapter 1.4-1, 1.4-2, 1.4-3, & 1.4-4 (small boilers)
Boiler #4	E-2	

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